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10 *Attorneys for Plaintiff*  
11 TRACY CHAPMAN

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15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA

17 TRACY CHAPMAN,  
18 Plaintiff,  
19 vs.  
20 ONIKA TANYA MARAJ p/k/a  
21 NICKI MINAJ and DOES 1-10,  
22 Defendants.

23 No. 2:18-cv-09088-VAP-SS  
24 Honorable Virginia A. Phillips  
25  
**PLAINTIFF TRACY CHAPMAN'S  
NOTICE OF ACCEPTANCE AND  
ACCEPTANCE OF DEFENDANT'S  
RULE 68 OFFER OF JUDGMENT**

26  
27 Final Pretrial Conf.: February 22, 2021  
28 Trial Date: March 2, 2021

1 Pursuant to Rule 68(a) of the Federal Rules of Civil Procedure, Plaintiff  
2 Tracy Chapman (“Ms. Chapman”), through her undersigned counsel, hereby  
3 accepts and provides notice that she has accepted Defendant’s Rule 68 Offer of  
4 Judgment to Ms. Chapman dated December 17, 2020, attached hereto as **Exhibit A.**

5  
6 Dated: December 30, 2020

Respectfully submitted,  
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8 MANATT, PHELPS & PHILLIPS LLP

9 By: /s/ John M. Gatti  
10 John M. Gatti  
Lauren J. Fried  
*Attorneys for Plaintiff*  
**TRACY CHAPMAN**

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# EXHIBIT A

1 BROWNE GEORGE ROSS  
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12 Attorneys for Defendant  
13 ONIKA TANYA MARAJ  
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16 TRACY CHAPMAN,  
17 Plaintiff,  
18 vs.  
19 ONIKA TANYA MARAJ p/k/a NICKI  
20 MINAJ and DOES 1-10,  
21 Defendants.

22 Case No. 2:18-cv-9088-VAP-SS  
23 Judge: Hon. Virginia A. Phillips  
24 DEFENDANT ONIKA MARAJ'S  
25 RULE 68 OFFER OF JUDGMENT  
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Date Filed: October 22, 2018  
Disc. Cutoff: July 29, 2020  
FPC: February 22, 2021  
Trial Date: March 2, 2021

1 Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant Onika  
2 Tanya Maraj (“Defendant”) hereby offers to allow entry of judgment as follows:

3 Judgment shall be entered in favor of plaintiff Tracy Chapman and against  
4 Defendant in the amount of \$450,000, inclusive of all costs and attorney fees  
5 incurred to date.

6  
7 DATED: December 17, 2020

BROWNE GEORGE ROSS  
O'BRIEN ANNAGUEY & ELLIS LLP  
Peter W. Ross  
Eric C. Lauritsen

10 By: /s/ Peter W. Ross

11 Peter W. Ross  
12 Attorneys for Defendant Onika Tanya Maraj

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## PROOF OF SERVICE

**Chapman v. Maraj p/k/a Nicki Minaj  
USDC Case No. 2:18-cv-9088**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2800, Los Angeles, CA 90067.

On December 17, 2020, I served true copies of the following document(s) described as **DEFENDANT ONIKA MARAJ'S RULE 68 OFFER OF JUDGMENT** on the interested parties in this action as follows:

John M. Gatti, Esq.  
Maura K. Gierl, Esq.  
Lauren J. Fried, Esq.  
MANATT, PHELPS & PHILLIPS, LLP  
11355 West Olympic Boulevard  
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Attorneys for Plaintiff  
Tracy Chapman

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Browne George Ross O'Brien Annaguey & Ellis LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** On December 17, 2020, I caused a copy of the document(s) to be sent from e-mail address aaugustine@bgrfirm.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on December 17, 2020, at Los Angeles, California.

*[Signature]*

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Andrea A. Augustine

**PROOF OF SERVICE**

I, Erica Nash, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2049 Century Park East, Suite 1700, Los Angeles, California 90067. On **December 30, 2020**, I served a copy of the within document(s):

**PLAINTIFF TRACY CHAPMAN'S NOTICE OF ACCEPTANCE AND ACCEPTANCE  
OF DEFENDANT'S RULE 68 OFFER OF JUDGMENT**

- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Los Angeles, California addressed as set forth below.
- by placing the document(s) listed above in a sealed **FEDERAL EXPRESS** envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a **FEDERAL EXPRESS** agent for delivery.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

*Please see attached Service List.*

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on **December 30, 2020**, at Los Angeles, California.

/s/ Erica Nash  
Erica Nash

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